

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT
2017 NOV -3 PM 1:53

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

KELLI PARIANO

Plaintiff,

vs.

MICHAEL PERROTTI

Defendant.

) CASE NO.: 17CIV0860

) JUDGE COLLIER

) MAGISTRATE LEAVER

) MAGISTRATE BRENSTUHL

) MAGISTRATE'S ORDER

) WITH INSTRUCTIONS FOR SERVICE

This matter is scheduled for a case management conference on:

December 12, 2017 at 10:00 a.m.

This is not a telephone conference. Attendance is required by counsel and all pro-se parties. Failure to appear may result in dismissal of this matter. Attendance

by clients is not required.

IT IS SO ORDERED.


JAMES R. LEAVER
MAGISTRATE

The Clerk of Courts is instructed to send copies of this Order to the below listed parties or their attorneys as mandated by Civil Rule 53(D)(2)(a)(ii).

Atty. Sheldon
Atty. Breen
Atty. Jones

Copies of this Order were mailed by the Clerk of Courts on 11-6-17.


DEPUTY CLERK OF COURT

Exhibit D

COMMON PLEAS COURT

Medina County Court of Common Pleas
Medina, Ohio

2017 SEP -1 PM 3:16

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTSKelli Pariano
PlaintiffCase No. **17CV0860**

vs.

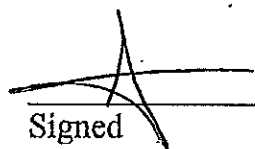
CHRISTOPHER J. COLLIER, JUDGE

Michael Perrotti
Defendant

INSTRUCTIONS FOR SERVICE

Type of Service ☒ Certified Mail
☐ Ordinary Mail with Certificate of Service
☐ Sheriff - Personal Service
☐ Sheriff - Residence Service
☐ Foreign Sheriff _____ County - Fee Paid ☐
☐ Process Server

Name of Party to be Served Michael PerrottiAddress for Service 2307 Angela Vista Drive
Hinckley, Ohio 44123Papers to be Served (Be Specific) ComplaintSpecial Instructions _____

_____
Signed

THE COURT OF COMMON PLEAS
CIVIL DIVISION
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

2017 SEP -1 PM 3:16

KELLI PARIANO
22310 Riverwalk Lane
Rocky River, Ohio 44116

CASE NO.:

17CIV00860

JUDGE: CHRISTOPHER J. COLLIER, JUDGE

Plaintiff

v.

MICHAEL PERROTTI
2307 Angela Vista Drive
Hinckley, Ohio 44233

ATTACHMENT TO FILING OF
COMPLAINT

Defendant

Attached is Plaintiff's school schedule, Plaintiff respectfully requests that discovery deposition involving Plaintiff, and Court pretrial and trial be set when her school is not in session to prevent difficulty with her employer.

L. Ray Jones #0011508
Attorney for Plaintiff
PO Box 592
Medina, Ohio 44258
330-722-1234
Fax: 330-723-7777
Email: attorneyrayjones@gmail.com

C

SCHOOL DISTRICT CALENDAR 2017-2018

APPROVED MAY 9, 2017

JULY 2017						
S	M	T	W	T	F	S
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JUNE 2018						
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IMPORTANT DATES	
Independence Day	7/4
New Teacher Orientation	7/20-26
Pre-Service	7/27-8/1
First Day of School	8/2
In-Service Day	8/25
Labor Day	9/4
In-Service/Records Day	10/6
Fall Break*	10/9-13
Parent/Teacher Conferences	10/24-27
Veteran's Day (honored)	11/10
Thanksgiving Break	11/23-24
Records Day	12/22
Winter Break	12/25-1/5
Martin Luther King Day	1/15
Parent/Teacher Conferences	2/7-9
Rodeo Break	2/22-23
In-Service/Records Day	3/19
Spring Break	3/20-23
Good Friday	3/30
Easter	4/1
Cesar Chavez Day (honored)*	4/2
Last Day of School	5/24
Records Day	5/25
Memorial Day	5/28

Symbol Key

First and Last Day for Students
No classes, Holiday for employees
Non-contract Day (except 12 mo.)
In-Service/Records/Pre-Service
New Teacher Orientation
Parent/Teacher Conference

1st Quarter 8/2 - 10/5 = 45 Days
 2nd Quarter 10/16 - 12/21 = 46 Days
 3rd Quarter 1/8 - 3/16 = 47 Days
 4th Quarter 3/26 - 5/24 = 42 Days
 Total = 180 Days

180	Instructional Days
9	In-Service/Records/Pre-Service Days
22	Holidays (24 for 12 month employees)
6	Non-Contract Days (less than 12 month employees)

Office of Public Information

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT
2017 OCT 23 AM 11:20

KELLI PARIANO

Plaintiff,

v.

MICHAEL PERROTTI

Defendant.

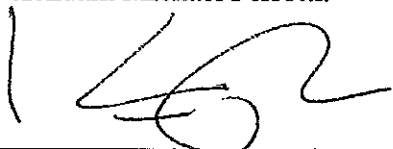
CASE NO.: 17-CVI-0860

JUDGE CHRISTOPHER J. COLLIER

NOTICE OF APPEARANCE OF
COUNSEL FOR DEFENDANT

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

The undersigned counsel Kevin J. Breen Co., LLC and Kevin J. Breen, Esq. hereby enters an appearance as counsel of record on behalf of Defendant Michael Perrotti. Please forward all notices directly to the undersigned on behalf of Defendant Michael Perrotti.


Kevin J. Breen, Esq. (#0034670)
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com

Attorney for Defendant

CERTIFICATE OF SERVICE

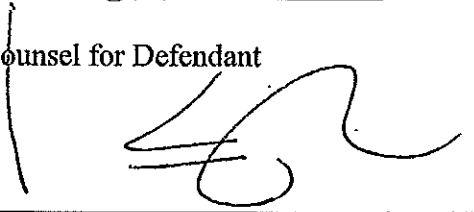
I hereby certify that a copy of the Notice of Appearance of Counsel For Defendant has been served electronically this 26 day of October, 2017 upon the following:

L. Ray Jones, Esq.
P.O. Box 592
Medina, Ohio 44258
Email: attorneyrayjones@gmail.com

Attorneys for Plaintiff

David C. Sheldon, Esq.
669 West Liberty Street
Medina, Ohio 44256
Email: david@davidsheldonlaw.net

Co-counsel for Defendant


Kevin J. Breen

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

KELLI PARIANO

Plaintiff,

v.

MICHAEL PERROTTI

Defendant.

CASE NO.: 17-CVI-0860

JUDGE CHRISTOPHER J. COLLIER

NOTICE OF APPEARANCE OF
COUNSEL FOR DEFENDANT

2017 OCT 23 AM 11:20

FILED
DAVID C. SHELDON
MEDINA COUNTY
CLERK OF COURTS

The undersigned counsel Kevin J. Breen Co., LLC and Kevin J. Breen, Esq. hereby enters an appearance as counsel of record on behalf of Defendant Michael Perrotti. Please forward all notices directly to the undersigned on behalf of Defendant Michael Perrotti.



Kevin J. Breen, Esq. (#0034670)
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com

Attorney for Defendant

CERTIFICATE OF SERVICE

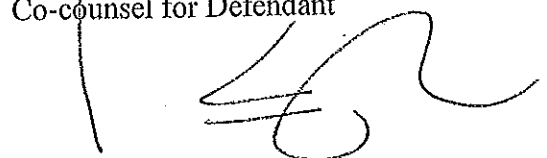
I hereby certify that a copy of the Notice of Appearance of Counsel For Defendant has been served electronically this 20 day of October, 2017 upon the following:

L. Ray Jones, Esq.
P.O. Box 592
Medina, Ohio 44258
Email: attorneyrayjones@gmail.com

Attorneys for Plaintiff

David C. Sheldon, Esq.
669 West Liberty Street
Medina, Ohio 44256
Email: david@davidsheldonlaw.net

Co-counsel for Defendant



Kevin J. Breen

COPY

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

2017 NOV -2 PM 3:55

KELLI PARIANO

Plaintiff,

vs.

MICHAEL PERROTTI

Defendant.

CASE NO.: 17 CIV 0860

JUDGE CHRISTOPHER J. COOPER

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

ANSWER OF DEFENDANT

With Jury Demand Endorsed Hereon

Defendant Michael Perrotti, through the undersigned counsel and pursuant to Civ. R. 8 and 12 hereby answers the Complaint by numbered paragraph thereof as follows:

1. Paragraph 1. Defendant admits that this is a re-filed action of Case No. 16 CIV 0381 but denies the balance of the allegations thereof. Further responding, the dockets in the respective cases speak for themselves.
2. Paragraphs 2 and 3. All allegations are denied.
3. Paragraph 4. Defendant admits that he notified Plaintiff of his Herpes Simplex condition prior to the commencement of any intimate or sexual relationship but denies the remaining allegations therein.
4. Paragraphs 5 and 6. Upon information and belief, all allegations are denied.
5. Paragraph 7. Plaintiff incorporates herein by reference his responses to paragraph 1-6 of the Complaint as is fully rewritten herein.
6. Paragraphs 8 and 9. All allegations are denied.

WHEREFORE, having fully responded to the allegations of the Complaint, Defendant request that the Complaint be dismissed with prejudice at Plaintiff's cost.

FIRST AFFIRMATIVE DEFENSE

7. Plaintiff had knowledge of Defendant's Herpes Simplex condition prior to the commencement of any intimate or sexual relationship with Defendant.

SECOND AFFIRMATIVE DEFENSE

8. Plaintiff's condition with respect to her infection of Herpes or any other sexually transmitted disease or condition is a pre-existing condition pre-dating any sexual relationship with Defendant.

THIRD AFFIRMATIVE DEFENSE

9. Any sexual relations or sexual contact between Plaintiff and Defendant was consensual.

FOURTH AFFIRMATIVE DEFENSE

10. Plaintiff's condition with respect to her infection of Herpes or any other sexually transmitted disease or condition is a result of Plaintiff's knowing and voluntary assumption of a known risk.

FIFTH AFFIRMATIVE DEFENSE

11. Plaintiff's condition with respect to her infection of Herpes or any other sexually transmitted disease or condition is the responsibility of third parties who have not been joined in this action.

SIXTH AFFIRMATIVE DEFENSE

12. Upon information and belief, Plaintiff's claim is frivolous within the meaning of O.R.C. § 2323.51.

SEVENTH AFFIRMATIVE DEFENSE

13. This action should be stayed pending Plaintiff's payment of costs of her same claim previously dismissed in Case No. 16 CIV 0381, including but not limited to three (3) separately properly noticed depositions of Plaintiff for which plaintiff failed to appear.

EIGHTH AFFIRMATIVE DEFENSE

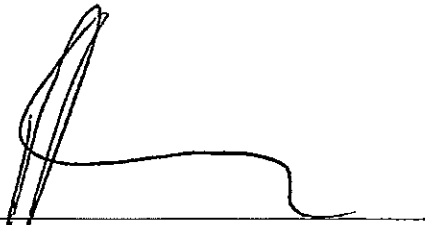
14. The Complaint is barred by the applicable statute of limitations.

NINTH AFFIRMATIVE DEFENSE

15. The Complaint fails to state a claim upon which relief can be granted.

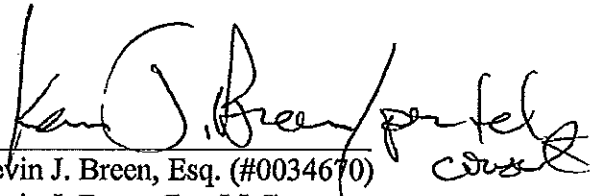
JURY DEMAND

Pursuant to Civ. R. 38(B), Defendant demands a jury trial composed of eight (8) members.



David C. Sheldon, Esq. (#0040523)
669 West Liberty Street
Medina, Ohio 44256
Telephone: (330) 723-8788
Facsimile:
Email: david@davidsheldonlaw.net

Attorney for Defendant



Kevin J. Breen, Esq. (#0034670)
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com

Attorney for Defendant

CERTIFICATE OF SERVICE

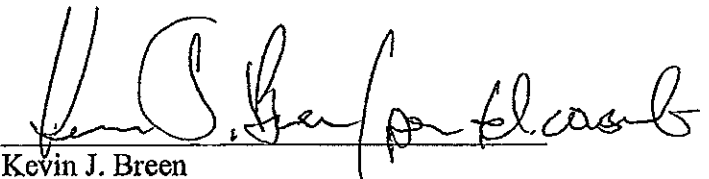
I hereby certify that a copy of the Answer of Defendant has been served electronically
this 20 day of November, 2017 upon the following:

L. Ray Jones, Esq.
P.O. Box 592
Medina, Ohio 44258
Email: attorneyrayjones@gmail.com

Attorneys for Plaintiff

David C. Sheldon, Esq.
669 West Liberty Street
Medina, Ohio 44256
Email: david@davidsheldonlaw.net

Co-counsel for Defendant


Kevin J. Breen

COMMON PLEAS COURT
2017 NOV -2 PM 3:56

Defendant

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

CASE NO. 17CIV0860
JUDGE CHRISTOPHER COLLIER

MOTION TO BIFURCATE PUNITIVE
DAMAGES


KEVIN J. BREEN, ESQ. (#0034670)
Co-Counsel for Michael Perrotti
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com

COPY

Certificate of Service

A copy of the forgoing has been sent by regular mail and fax to (330) 723-7777, on this 2nd day of November, 2016 to the following:

L. Ray Jones, Esq.
215 W. Washington Street
Medina, Ohio 44256



DAVID C. SHELDON

COPY

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT
2017 NOV -3 PM 1:53

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

KELLI PARIANO

Plaintiff,

vs.

MICHAEL PERROTTI

Defendant.

) CASE NO.: 17CIV0860

) JUDGE COLLIER

) MAGISTRATE LEAVER

) MAGISTRATE BRENSTUHL

) MAGISTRATE'S ORDER


) WITH INSTRUCTIONS FOR SERVICE

This matter is scheduled for a case management conference on:

December 12, 2017 at 10:00 a.m.

This is not a telephone conference. Attendance is required by counsel and all pro-se parties. Failure to appear may result in dismissal of this matter. Attendance by clients is not required.

IT IS SO ORDERED.


JAMES R. LEAVER
MAGISTRATE

The Clerk of Courts is instructed to send copies of this Order to the below listed parties or their attorneys as mandated by Civil Rule 53(D)(2)(a)(ii).

Atty. Sheldon
Atty. Breen
Atty. Jones

Copies of this Order were mailed by the Clerk of Courts on 11-6-17.


DEPUTY CLERK OF COURT

**IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO**

COMMON PLEAS COURT

KELLI PARIANO**CASE NO.: 17-CVI-0860****2017 NOV -8 PM 4:23****Plaintiff,**

JUDGE CHRISTOPHER J. COLLIER FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

vs.**MICHAEL PERROTTI**

**DEFENDANT'S MOTION TO STAY
PROCEEDINGS PENDING PLAINTIFF'S
PAYMENT OF COSTS OF PREVIOUSLY
DISMISSED ACTION**

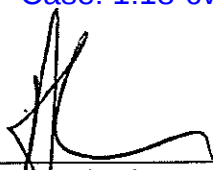
Defendant.

Defendant Michael Perrotti, pursuant to Civ. R. 41(D) hereby, moves this Court for an Order staying these proceedings pending Plaintiff's payment of costs of the same action previously dismissed. The pending action was previously filed in this Court on April 13, 2016 in the case captioned, **Kelli Pariano v. Michael Perrotti**, Case No. 16 CIV 0381. That action was dismissed and re-filed herein on September 1, 2017 (Complaint @ ¶ 1).

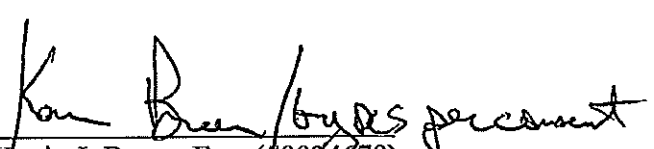
In the previously filed action, Defendant noticed Plaintiff for deposition pursuant to Civ. R. 30(B) on three (3) separate occasions, January 4, 2017, March 15, 2017, and July 26, 2017 (originally scheduled for July 26, 2017, but rescheduled to Monday, July 31, 2017, by agreement of counsel). With little or no prior notice or agreement of counsel, Plaintiff failed to appear and/or unilaterally canceled each of the three (3) occasions for her deposition.

Defendant incurred attorneys fees for the preparation and appearance at the canceled depositions in the amount of One Thousand Seven Hundred Nineteen and 73/100 (\$1,719.73) Dollars. The fee bill for these charges is not attached to protect attorney-client communications but can be made available to the Court, as necessary. Defendant submits that this Court should "deem proper" the payment of these costs from Plaintiff to Defendant and should stay this action until such costs are paid. Attorney Sheldon has attached an Affidavit in support of the requests for fees.

COPY



David C. Sheldon, Esq. (#0040523)
669 West Liberty Street
Medina, Ohio 44256
Telephone: (330)723-8788
Facsimile:
Email: david@davidsheldonlaw.net



Kevin J. Breen, Esq. (#0034670)
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com

COPY

STATE OF OHIO

)

) ss:

AFFIDAVIT

)

MEDINA COUNTY

)

David C. Sheldon being first duly sworn deposes and says:

1. He is an attorney at law duly licensed to practice law in the State of Ohio since 1988 and is assigned Registration No. 0040523 by the Ohio Supreme Court.

2. Affiant states that he was counsel of record representing the defendant, Michael Perrotti, in Medina County Common Pleas Court Case No. 16 CIV 0381, which was dismissed voluntarily by plaintiff on July 28, 2017. Plaintiff thereafter refiled the same action on September 1, 2017.

3. Affiant states that in the previously filed action, he noticed the plaintiff for deposition on three separate occasions: January 4, 2017, March 15, 2017, and July 31, 2017 (originally set for July 26, 2017, but rescheduled to Monday, July 31, 2017, by agreement of counsel). Affiant states that he prepared for the depositions each time by reviewing discovery materials, developing questions, and meeting with the client and reviewing proposed questions drafted by the client. Affiant also incurred certified mail costs for other non-party witnesses scheduled to appear on July 31, 2017.

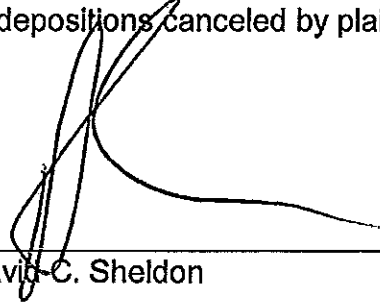
4. Affiant states that his hourly rate for professional services is \$225/hour, and that said rate is reasonable based on counsel's years of experience practicing law, other rates charged by attorneys with similar experience and years of practice, and the Ohio Bar Association's "The Economics of Law Practice 2013" triennial study of attorney income, billing rates, and other economic trends, published in Ohio Lawyer, Vol. 27, No. 5 (September/October 2013).

5. Affiant states that he incurred a total of One Thousand Seven Hundred Nineteen and 73/100 (\$1,719.73) Dollars in attorney fees and expenses in preparation of the depositions.

6. Affiant states that none of the depositions took place due to plaintiff's unilateral cancelation of said depositions on little or short notice. In fact, counsel did not learn the depositions scheduled for Monday, July 31, 2017, were not going forward until Friday, July 28, 2017, when, while meeting with his client to prepare for same, decided to call Mr. Jones' office to make sure the depositions were going forward on Monday. He then learned through Mr. Jones' secretary that Mr. Jones was on his way to the clerk's office to voluntarily dismiss the case.

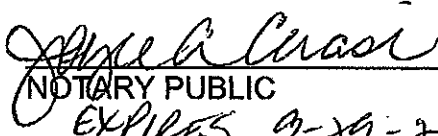
7. Affiant states that before the pending litigation should continue and further time and fees are incurred by counsel, the plaintiff should be required to pay for counsel's fees and expenses incurred in preparation of the depositions canceled by plaintiff in the previously dismissed action.

FURTHER AFFIANT SAYETH NAUGHT.



David C. Sheldon

SWORN TO BEFORE ME and subscribed in my presence this 8TH day of November, 2017.



NOTARY PUBLIC
EXPIRES 9-29-20

COPY

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

2017 NOV 13 PM 3:29

KELLI PARIANO

Plaintiff,

vs.

MICHAEL PERROTTI

Defendant.

CASE NO.: 17CIV0860

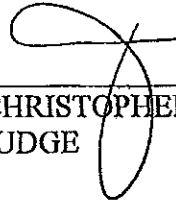
JUDGE CHRISTOPHER J. COLLIER

JOURNAL ENTRY WITH
INSTRUCTIONS FOR SERVICE

The matter is before the court on the Plaintiff's motion to stay the proceedings. The motion fails to comply with local rule 5(F).

The motion is denied.

IT IS SO ORDERED.


CHRISTOPHER J. COLLIER
JUDGE

The Clerk of Courts is instructed to send copies of the foregoing Journal Entry to the following parties or their counsel of record.

Atty. Jones
Atty. Sheldon
Atty. Breen

Copies of this Entry were mailed by the Clerk of Courts on 11-15-17.


DEPUTY CLERK OF COURT

COPY

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

KELLI PARIANO

Plaintiff,

vs.

MICHAEL PERROTTI

Defendant.

CIV
CASE NO.: 17-CV-0860

JUDGE CHRISTOPHER J. COLLIER

DEFENDANT'S MOTION TO STAY
PROCEEDINGS PENDING PLAINTIFF'S
PAYMENT OF COSTS OF PREVIOUSLY
DISMISSED ACTION

2017 NOV 28 PM 4:16


FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

Defendant Michael Perrotti, pursuant to Civ. R. 41(D) hereby, moves this Court for an Order staying these proceedings pending Plaintiff's payment of costs of the same action previously dismissed. The pending action was previously filed in this Court on April 13, 2016 in the case captioned, Kelli Pariano v. Michael Perrotti, Case No. 16 CIV 0381. That action was dismissed and re-filed herein on September 1, 2017 (Complaint @ ¶ 1).

In the previously filed action, Defendant noticed Plaintiff for deposition pursuant to Civ. R. 30(B) on three (3) separate occasions, January 4, 2017, March 15, 2017, and July 26, 2017 (originally scheduled for July 26, 2017, but rescheduled to Monday, July 31, 2017, by agreement of counsel). With little or no prior notice or agreement of counsel, Plaintiff failed to appear and/or unilaterally canceled each of the three (3) occasions for her deposition.

Defendant incurred attorneys fees for the preparation and appearance at the canceled depositions in the amount of One Thousand Seven Hundred Nineteen and 73/100 (\$1,719.73) Dollars. The fee bill for these charges is not attached to protect attorney-client communications but can be made available to the Court, as necessary. Defendant submits that this Court should "deem proper" the payment of these costs from Plaintiff to Defendant and should stay this action until such costs are paid. Attorney Sheldon has attached an Affidavit in support of the requests for fees.

COPY


David C. Sheldon, Esq. (#0040523)
669 West Liberty Street
Medina, Ohio 44256
Telephone: (330)723-8788
Facsimile:
Email: david@davidsheldonlaw.net

Attorney for Defendant


Kevin J. Breen, Esq. (#0034670) *cont*
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com *DCS*

Attorney for Defendant

CERTIFICATE OF SERVICE

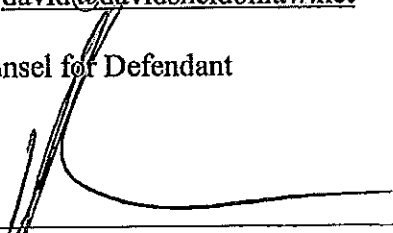
I hereby certify that a copy of the Defendant's Motion to Stay Proceedings Pending Plaintiff's Payment of Costs or Previously Dismissed Action has been served electronically this ____ day of November, 2017 upon the following:

L. Ray Jones, Esq.
P.O. Box 592
Medina, Ohio 44258
Email: attorneyrayjones@gmail.com

Attorneys for Plaintiff

David C. Sheldon, Esq.
669 West Liberty Street
Medina, Ohio 44256
Email: david@davidsheldonlaw.net

Co-counsel for Defendant



David C. Sheldon

COPY

STATE OF OHIO)
) **ss: AFFIDAVIT**
)
MEDINA COUNTY)

David C. Sheldon being first duly sworn deposes and says:

1. He is an attorney at law duly licensed to practice law in the State of Ohio since 1988 and is assigned Registration No. 0040523 by the Ohio Supreme Court.

2. Affiant states that he was counsel of record representing the defendant, Michael Perrotti, in Medina County Common Pleas Court Case No. 16 CIV 0381, which was dismissed voluntarily by plaintiff on July 28, 2017. Plaintiff thereafter refiled the same action on September 1, 2017.

3. Affiant states that in the previously filed action, he noticed the plaintiff for deposition on three separate occasions: January 4, 2017, March 15, 2017, and July 31, 2017 (originally set for July 26, 2017, but rescheduled to Monday, July 31, 2017, by agreement of counsel). Affiant states that he prepared for the depositions each time by reviewing discovery materials, developing questions, and meeting with the client and reviewing proposed questions drafted by the client. Affiant also incurred certified mail costs for other non-party witnesses scheduled to appear on July 31, 2017.

4. Affiant states that his hourly rate for professional services is \$225/hour, and that said rate is reasonable based on counsel's years of experience practicing law, other rates charged by attorneys with similar experience and years of practice, and the Ohio Bar Association's "The Economics of Law Practice 2013" triennial study of attorney income, billing rates, and other economic trends, published in Ohio Lawyer, Vol. 27, No. 5 (September/October 2013).

COPY

5. Affiant states that he incurred a total of One Thousand Seven Hundred Nineteen and 73/100 (\$1,719.73) Dollars in attorney fees and expenses in preparation of the depositions.


6. Affiant states that none of the depositions took place due to plaintiff's unilateral cancelation of said depositions on little or short notice. In fact, counsel did not learn the depositions scheduled for Monday, July 31, 2017, were not going forward until Friday, July 28, 2017, when, while meeting with his client to prepare for same, decided to call Mr. Jones' office to make sure the depositions were going forward on Monday. He then learned through Mr. Jones' secretary that Mr. Jones was on his way to the clerk's office to voluntarily dismiss the case.

7. Affiant states that before the pending litigation should continue and further time and fees are incurred by counsel, the plaintiff should be required to pay for counsel's fees and expenses incurred in preparation of the depositions canceled by plaintiff in the previously dismissed action.

FURTHER AFFIANT SAYETH NAUGHT.


David C. Sheldon

SWORN TO BEFORE ME and subscribed in my presence this 28TH day of November, 2017.


NOTARY PUBLIC
EXPIRES 9/29/19

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT
2017 DEC -1 PM 3:09

KELLI PARIANO

Plaintiff

vs.

MICHAEL PERROTTI

Defendant.

) CASE NO.: 17CIV0860

) JUDGE COLLIER

) MAGISTRATE LEAVER

) MAGISTRATE BRENSTUHL

) MAGISTRATE'S ORDER

) WITH INSTRUCTIONS FOR SERVICE

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

The Defendant's motion to stay proceedings is scheduled for non-oral hearing on:

December 20, 2017 at 8:30 a.m.

Any response in opposition must be filed by December 19, 2017.

No appearance is necessary.

IT IS SO ORDERED.



JAMES R. LEAVER
MAGISTRATE

The Clerk of Courts is instructed to serve this Order on all parties or their attorneys as mandated by Civil Rule 53(D)(2)(a)(ii).

Atty. Jones

Atty. Breen

Atty. Sheldon

Copies of this Order were mailed by the Clerk of Courts on 12-4-17.



DEPUTY CLERK OF COURT

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIOCOMMON PLEAS COURT
2017 DEC 12 PM 3:58KELLI PARIANO

Plaintiff(s),

-vs-

MICHAEL PERROTTI

Defendant(s)

CASE NO. 17CV0860 FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

JUDGE CHRISTOPHER J. COLLIER

MAGISTRATE JAMES R. LEAVER
MAGISTRATE KEITH L. BRENSTUHLCIVIL SCHEDULING ORDERTrial:A.D.R.: This Matter is referred to mediation on: To be arranged by counsel / necessary 330-24-8731 at
_____ o'clock ____ m.The case is set for jury trial on June 25, 2018 at 1:00 p.m.Backup trial date July 9, 2018 AT 1:00 PM.Discovery:Unless otherwise agreed, all fact discovery shall be completed by May 16, 2018.
Discovery disputes shall be disposed of in a manner consistent with the Ohio Civil Rules. This Court encourages cooperation and a spirit of professionalism in resolving disputes.Plaintiff(s) shall name all expert witnesses and expert reports will be given to the other party by April 2, 2018. Failure to comply with this portion of the order may result in the expert(s) being barred from testifying.Defendant(s) will name all expert witnesses and expert reports will be given to the other party by May 16, 2018. Failure to comply with this portion of this order may result in the expert(s) being barred from testifying.Motions:

All motions shall be accompanied by a suggested entry, although omission of a suggested entry shall not relieve the opposing party from filing a timely opposition. All proposed orders submitted to the Court for signature shall contain the names and addresses of all counsels.

Any Summary Judgment motions must be filed no later than May 1, 2018.

Motions in limine should be filed not less than one week prior to the trial date.

A list of proposed lay witnesses to be exchanged by April 2, 2018.

Trial Briefs:

Trial briefs must be filed by W/A and shall include:

1. a statement of the factual and legal issues; stipulations, if any;
2. a list of proposed witnesses and a brief summary of expected testimony; witnesses or exhibits not listed in the trial brief shall not testify or be introduced at trial absent a showing of good cause;
3. a list of proposed exhibits, as well as any special equipment needs for trial;
4. a discussion of any evidentiary issues anticipated at trial.

In the case of a trial by jury, Trial Briefs shall include any unique or sensitive proposed voir dire questions, as well as any proposed jury instructions peculiarly related to the case.

Exhibits:

All exhibits shall be properly marked and a copy furnished to the Court during trial.

IT IS SO ORDERED.

2/12/17
Date

[Signature]
JUDGE MAGISTRATE

Copies to:

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

KELLI PARIANO

Plaintiff,

-vs-

MICHAEL PERROTTI

Defendant.

CASE NO.: 17-CVI-0860

2017 DEC 20 PM 3:58

JUDGE CHRISTOPHER J. COLLIERED

DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTSJOURNAL ENTRY

This matter came before the Court on Defendant's Motion to Stay Proceedings Pending Plaintiff's Payment of Costs or Previously Dismissed Action in Case No. 16 CIV 0381. Upon consideration of said motion pursuant to Civ. R. 41(D) and for cause shown it is hereby determined that said motion is well taken and is granted. Plaintiff is ordered to reimburse Defendant for reasonable costs incurred in the previously dismissed action in the amount of \$1,719.73. This action is hereby stayed until proof of such payment is filed with the Court.

IT IS SO ORDERED.

JUDGE CHRISTOPHER J. COLLIER

cc: L. Ray Jones, Esq.
David C. Sheldon, Esq.
Kevin J. Breen, Esq.

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIOCOMMON PLEAS COURT
2018 JAN -5 PM 1:52
FILED
DAVID B. WADSWORTH
CLERK OF COURTS

KELLI PARIANO,

Plaintiff

-VS-

MICHAEL PERROTTI,

Defendant

CASE NO. 17-CIV-0860

JUDGE CHRISTOPHER COLLIER

MOTION FOR RECONSIDERATION

Now comes the Defendant, by and through counsel, and moves this Honorable Court to reconsider its previous ruling issued December 20, 2017, denying defendant's motion to stay proceedings pending plaintiff's payment of costs in the previously dismissed action, Case No. 16 CIV 0381. In support, Mr. Perrotti states that plaintiff's and defendants' counsel met with the Magistrate on December 12, 2017, for a case management conference. During that conference, the parties discussed the pending motion to stay proceedings filed by Mr. Perrotti. Following those discussions, counsel and the Magistrate *agreed* that the court would withhold hearing and ruling on the motion until the case was settled or prior to commencement of jury trial. At that time, the court would schedule the matter for a hearing unless the parties resolved the issue via settlement. The Magistrate and counsel all agreed to this procedure with respect to the motion.

For the foregoing reasons, Mr. Perrotti respectfully requests that the court reconsider and vacate its ruling denying the motion and issue an order withholding hearing and ruling on the motion to stay until either (1) the case settles and the motion is resolved by settlement or (2) the case is otherwise resolved by final order at which time the Court shall schedule a hearing on the motion.

Respectfully submitted,



DAVID C. SHELDON (#0040523)

Co-counsel for Michael Perrotti

669 West Liberty Street

Medina, OH 44256

Local: (330) 723-8788

Fax: (330) 723-4788

E-mail: david@davidsheldonlaw.net



KEVIN J. BREEN, ESQ. (#0034670)

Co-Counsel for Michael Perrotti

Kevin J. Breen Co., LLC

3500 West Market Street, Suite 4

Fairlawn, OH 44333

Telephone: (330) 666-3600

Facsimile: (330) 670-6556

Email: kevin.j.breen@gmail.com

PROOF OF SERVICE

A copy of the forgoing has been sent by regular mail and fax (330) 723-7777,
on this 5 day of January, 2018 to the following:

L. Ray Jones, Esq.
215 W. Washington Street
Medina, Ohio 44256



DAVID C. SHELDON

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

KELLI PARIANO,

Plaintiff

-vs-

MICHAEL PERROTTI,

Defendant

CASE NO. 17-CIV-0860

JUDGE CHRISTOPHER COLLIER

ORDERCOMMON PLEAS COURT
2018 JAN -8 PM 3:35
FILED
DAVID B. WADSWORTH
CLERK OF COURTS
MEDINA COUNTY

Upon due consideration and review and for good cause shown, defendant's motion for reconsideration is hereby granted. Based on the agreement of parties at the case management conference held on December 12, 2017, this court vacates its previous Order filed 20 December 2017 denying defendant's motion to stay proceedings filed on 28 November 2017, and hereby

The case is NOT STAYED AT THIS TIME,
ORDERS that the defendant's motion shall be held in abeyance and no hearing shall be held on the motion until either (1) the case settles and the parties resolve the motion via settlement or (2) the case is otherwise resolved by final order at which time the Court shall schedule a hearing on the motion.

IT IS SO ORDERED.

JUDGE

COPY

IN THE COURT OF COMMON PLEAS
CIVIL DIVISION
MEDINA COUNTY, OHIO

COMMON PLEAS COURT
2018 FEB 16 AM 8:35

KELLI PARIANO

Plaintiff

vs.

MICHAEL PERROTTI

Defendant

CASE NO. 17 CIV 0860

JUDGE CHRISTOPHER J. COLLIER

NOTICE OF DEPOSITION

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

Pursuant to Civ. R. 30(B)(5), Defendant will take the depositions of Kelli Pariano on March 21, 2018 at 1:00 p.m., before a court reporter or before some other officer duly authorized to administer oaths. Said depositions will take place at the offices of Attorney David C. Sheldon, 669 W. Liberty, Medina, Ohio 44256.

The depositions will commence at the time and date as mentioned above and continue from day to day until completed.

Respectfully submitted:



DAVID C. SHELDON (#0040523)

Attorney for Michael Perrotti

669 West Liberty Street

Medina, OH 44256

Phone: (330) 723-8788


Fax: (330) 723-4788

Email: david@davidsheldonlaw.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Deposition was served by fax at 330-723-7777, this 16 day of February 2018 upon:

L. Ray Jones, Esq.
215 W. Washington Street
Medina, Ohio 44256



DAVID C. SHELDON

Attorney for Michael Perrotti

COPY

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

2018 FEB 26 AM 11:04

KELLI PARIANO

Plaintiff,

v.

MICHAEL PERROTTI

Defendant.

CASE NO.: 17-CVI-0860


JUDGE CHRISTOPHER J. COLLIER
DAVID B. WADSWORTH
CLERK OF COURTSDEFENDANT'S MOTION FOR
PROTECTIVE ORDER

PROPOSED ORDER ATTACHED

Defendant Michael Perrotti pursuant to Civ. R. 26(C) hereby moves this Court with respect to the Notice of Deposition of Defendant Michael Perrotti on February 27, 2018 at 10:00 a.m.

This notice of deposition was served by facsimile on February 20, 2018 by Plaintiff without prior notice to Defendant's counsel. Neither of Defendant's two (2) counsel of record, Kevin J. Breen or David C. Sheldon are available for deposition on February 27, 2018. Attorney Breen is scheduled for an evidentiary hearing in the Summit County Juvenile Court on February 27, 2018. The hearing is expected to proceed the entire morning. Attorney Sheldon is scheduled for a suppression hearing on February 27, 2018 at 9:00 a.m. in the Medina County Juvenile Court. Finally, Defendant Perrotti is in the State of Florida and is not due to return until March 21, 2018. As such, neither Defendant nor his counsel is available on February 27, 2018, the date unilaterally selected by Plaintiff. Defendant remains available to scheduling Defendant's deposition for sometime after March 21, 2018.

An email to Plaintiff's counsel to reschedule is attached (Ex. A) along with a proposed order granting this motion for the Court's consideration (Ex. B).



Kevin J. Breen, Esq. (#0034670)
Kevin J. Breen Co., LLC
3500 West Market Street, Suite 4
Fairlawn, OH 44333
Telephone: (330) 666-3600
Facsimile: (330) 670-6556
Email: kevin.j.breen@gmail.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Defendant's Motion for Protective Order has been served electronically this 22 day of February, 2018 upon the following:

L. Ray Jones, Esq.
P.O. Box 592
Medina, Ohio 44258
Email: attorneyrayjones@gmail.com

Attorneys for Plaintiff

David C. Sheldon, Esq.
669 West Liberty Street
Medina, Ohio 44256
Email: david@davidsheldonlaw.net

Co-counsel for Defendant



Kevin J. Breen



Kevin Breen <kevin.j.breen@gmail.com>

Kelli Pariano v. Michael Perrotti

1 message

Kevin Breen <kevin.j.breen@gmail.com>

Thu, Feb 22, 2018 at 10:04 AM

To: Ray Jones <attorneyrayjones@gmail.com>

Cc: David Sheldon <david@davidsheldonlaw.net>

Bcc: Michael Perrotti <f14map3@gmail.com>

RE: Kelli Pariano v. Michael Perrotti
Medina County Court of Common Pleas
Case No. 17 CIV 0860
Judge Christopher J. Collier

Attorney Jones:

Attached please find a service copy of Defendant's Motion for Protective Order. Both David and I remain available to you to schedule Michael Perrotti's deposition for sometime after March 21, 2018 when he returns to Ohio. If you provide available dates to you after March 21, 2018 we will promptly coordinate to schedule same. Thank you.

Kevin J. Breen, Esq.
Kevin J. Breen Co., LLC
3500 W. Market Street, Suite 4
Fairlawn, OH 44333
Phone: (330) 666-3600
Facsimile: (330)-670-6556
Email: kevin.j.breen@gmail.com

**IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO**

KELLI PARIANO)	CASE NO.: 17-CVI-0860
)	
Plaintiff,)	JUDGE CHRISTOPHER J. COLLIER
)	
v.)	
)	ORDER
MICHAEL PERROTTI)	
)	
Defendant.)	

Upon consideration of Defendant's Motion for Protective Order and for cause shown, it is hereby determined that said motion is well taken and is granted. Plaintiff's notice of deposition of Defendant Perrotti for February 27, 2018 is hereby denied. The parties shall schedule Defendant's deposition to take place in Medina County after March 21, 2018 and the parties are ordered to cooperate in scheduling same.

IT IS SO ORDERED.

JUDGE CHRISTOPHER J. COLLIER

cc: L. Ray Jones, Esq.
David C. Sheldon, Esq.
Kevin J. Breen

IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

2018 MAR -2 AM 10:20

KELLI PARIANO

Plaintiff,

vs.

MICHAEL PERROTTI

Defendant.

CASE NO.: 17CIV0860

JUDGE COLLIER

MAGISTRATE LEAVER

MAGISTRATE BRENSTUHL

MAGISTRATE'S ORDERWITH INSTRUCTIONS FOR SERVICEFILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

The Defendant's motion for a protective order is scheduled for oral hearing on:

March 23, 2018 at 9:45 a.m.

Attendance is required.

IT IS SO ORDERED.


JAMES R. LEAVER
MAGISTRATE

The Clerk of Courts is instructed to perfect service of this Order on the below listed parties or their attorneys as mandated by Civil Rule 53(D)(2)(a)(ii).

Atty. Jones
Atty. Breen
Atty. Sheldon

Copies of this Order were mailed by the Clerk of Courts on

3-5-18
DEPUTY CLERK OF COURT

IN THE COURT OF COMMON PLEAS
CIVIL DIVISION
MEDINA COUNTY, OHIO

COMMON PLEAS COURT

2018 MAR 21 PM 3:01

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

KELLI PARIANO

CASE NO: 17CIV0860

Plaintiff

JUDGE: CHRISTOPHER COLLIER

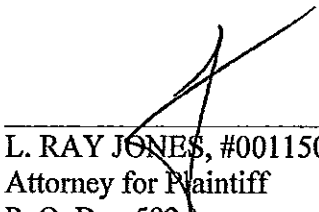
vs.

MICHAEL PERROTTI

PROTECTIVE ORDER IS MOOT

Defendant

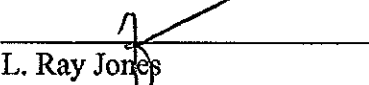
Plaintiff requests that the Court cancel the hearing on the Motion for Protective order set for March 23, 2018 at 9:45 a.m. as the Defendant submitted himself for deposition on March 21st, 2018. The issue raised by Defendant is moot.



L. RAY JONES, #0011508
Attorney for Plaintiff
P. O. Box 592
Medina, OH 44258
(330) 722-1234 or 225-1234

Certificate of Service

A copy of the within has been sent via fax to Attorney for Defendant, David Sheldon at 330.723.4788 and Kevin Breen at 330-670-6556 on the 21 of March, 2018.



L. Ray Jones
Attorney for Plaintiff

**IN THE COURT OF COMMON PLEAS
CIVIL DIVISION
MEDINA COUNTY, OHIO**

COMMON PLEAS COURT

2018 MAR 23 AM 11:42

**FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS**

KELLI PARIANO

CASE NO: 17CIV0860

Plaintiff

JUDGE: CHRISTOPHER COLLIER

vs.

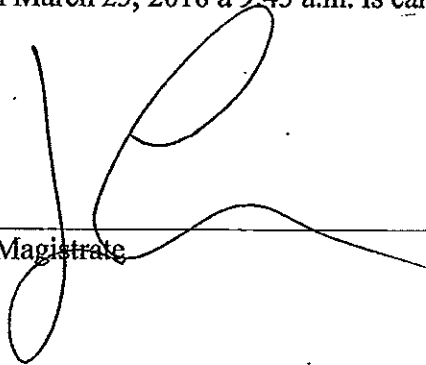
MICHAEL PERROTTI

MAGISTRATE'S ORDER

Defendant

Upon Request of Plaintiff and for good cause shown, the hearing on Defendant's Request for Protective Order set for hearing on March 23, 2018 a 9:45 a.m. is canceled.

Magistrate



COPY

**IN THE COURT OF COMMON PLEAS COMMON PLEAS COURT
MEDINA COUNTY, OHIO**

2018 APR -2 PM 4:01

KELLI PARIANO

Plaintiff

vs.

MICHAEL PERROTTI

Defendant

) **CASE NO. 17-CV-0860**

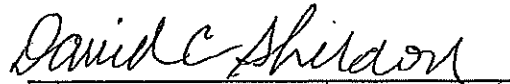
) **JUDGE CHRISTOPHER COLLIER**

) **NOTICE OF SERVICE**

Pursuant to Rule 5(D) of the Ohio Rules of Civil Procedure, notice is hereby given that Defendant caused to be served upon Plaintiff, Kelli Pariano, c/o L. Ray Jones, Esq., 215 W. Washington Street, Medina, Ohio 44256 via regular U.S. mail and fax to 330-723-7777:

Defendant's Expert Report.

Respectfully submitted,

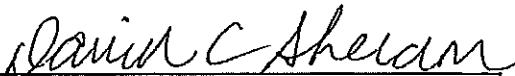


DAVID C. SHELDON #0040523
Attorney for Michael Perrotti
669 West Liberty Street
Medina, Ohio 44256
Phone: (330) 723-8788
Fax: (330) 723-4788
Toll Free: (866) 336-6030
Email: david@davidsheldonlaw.net

Certificate of Service

This is to certify that a true copy of the foregoing Notice of Service was served this 2nd day of April 2018, upon counsel for Plaintiff via regular U.S. mail and fax to:

L. Ray Jones
215 W. Washington Street
Medina, Ohio 44256


DAVID C. SHELDON #0040523
Attorney for Michael Perrotti

**IN THE COURT OF COMMON PLEAS
MEDINA COUNTY, OHIO**

KELLI PARIANO

Plaintiff

-vs-

MICHAEL PERROTTI

Defendant

CASE NO. 17-CIV-0860

JUDGE CHRISTOPHER COLLIER

DEFENDANT'S WITNESS & EXHIBIT LIST

Now comes the Defendant, by and through counsel, and hereby give notice to opposing counsel of the witnesses and exhibits they intend to introduce at trial.

WITNESSES

1. Any and all hospital personnel, staff, physicians at General Health Center with knowledge of STD testing of Plaintiff in April 2015.
2. Anyone to authenticate any exhibit at trial
3. Anyone listed on Plaintiff's witness list.

EXHIBITS

1. Any and all medical records of plaintiff;
2. Deposition of plaintiff;
3. Expert report of defendant;
4. Answers to requests for admissions and interrogatories of plaintiff in prior case, 16CIV0381.

Respectfully submitted,

DAVID C. SHELDON (#0040523)

Co-counsel for Michael Perrotti

669 West Liberty Street

Medina, OH 44256

Local: (330) 723-8788

Fax: (330) 723-4788

E-mail: david@davidsheldonlaw.net

KEVIN J. BREEN, ESQ. (#0034670)

Co-Counsel for Michael Perrotti

Kevin J. Breen Co., LLC

3500 West Market Street, Suite 4

Fairlawn, OH 44333

Telephone: (330) 666-3600

Facsimile: (330) 670-6556

Email: kevin.j.breen@gmail.com

PROOF OF SERVICE

A copy of the forgoing has been sent by regular mail and fax (330) 723-7777, on this ____ day of April 2018 to the following:

L. Ray Jones, Esq.
215 W. Washington Street
Medina, Ohio 44256

DAVID C. SHELDON

**IN THE COURT OF COMMON PLEAS
CIVIL DIVISION
MEDINA COUNTY, OHIO**

COMMON PLEAS COURT

2018 APR 13 PM 2:46

FILED
DAVID B. WADSWORTH
MEDINA COUNTY
CLERK OF COURTS

KELLI PARIANO

CASE NO: 17 CIV 0860

Plaintiff

JUDGE: CHRISTOPHER COLLIER

vs.

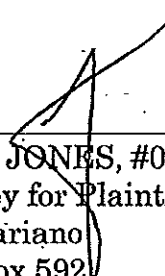
MICHAEL PERROTTI

NOTICE OF SERVICE

Defendant

Pursuant to Ohio Civil Rules of Procedure 5(D), notice is hereby given that Plaintiff caused to be served upon Defendant, Michael Perrotti, c/o Attorney for the Defendant on March 29, 2018.


Plaintiff's Expert Report



L. RAY JONES, #0011508
Attorney for Plaintiff,
Kelli Pariano
P. O. Box 592
Medina, OH 44258
(330) 722-1234 or 225-1234

Certificate of Service

A copy of the within Notice of Service has been sent via fax to Attorney for Defendant, David Sheldon at 330.723.4788, and Kevin Breen, Attorney for the Defendant, via email kevin.j.breen@gmail.com on the 18th of April, 2018.



L. Ray Jones
Attorney for the Plaintiff,
Kelli Pariano



Sam N. Ghoubril MD, Inc.
Internal Medicine and Family Practice

195 Wadsworth Road
Suite 402
Wadsworth, Ohio 44281
Telephone: (330) 331-7207
Fax: (330) 331-7587

REVIEW OF MEDICAL RECORDS
Independent Medical Report

March 29, 2018

Ray Jones, Attorney at Law
215 West Washington Street
Medina, OH 44258.

Re: Kelli Pariano

Dear Mr. Jones:

I have had the opportunity to review the medical records pertaining to Kelli Pariano. These records include the Cleveland Clinic records as well as the records from various hospitals and institutions. First of all, in looking at these records I see no history that Kelli Pariano was infected with genital herpes prior to intercourse with her sexual partner. After her workup at the Cleveland Clinic and various institutions, I do note that cultures did come back positive for genital herpes. Unfortunately, this condition will require lifelong treatment and monitoring.

There are two components to the infection of genital herpes. First of all, there is the infectious component which will require long-term treatment for her. There is also the potential that this individual could infect any offspring as well as any future sexual partners. This will require lifelong treatment. The cost of this treatment is approximately \$25,000.00 to \$30,000.00, given her age. The second component to this is the posttraumatic stress disorder and having to live with a lifelong infection that has no cure. The treatment modalities we have are simply to suppress viral replication and hopefully prevent outbreaks. She will always be considered infectious even while on the medication and will have to use prophylactic measures.

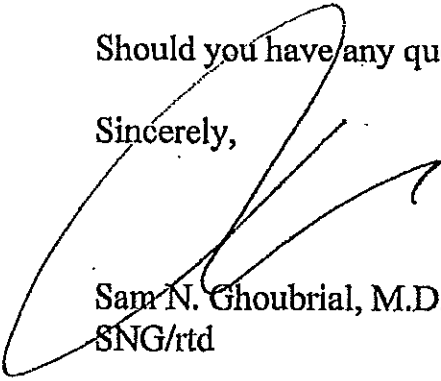
Continued on Page Two

Re: Kelli Pariano

Based on my evaluation of these records, it was clear that this woman was deliberately infected, and this is in fact a form of assault, in my opinion. I can say with a reasonable degree of medical certainty that she will require lifelong treatment in excess of \$25,000.00. She will also probably need some sort of counseling which should hopefully be limited to one year and approximately \$5,000.00. The emotional and physical toll of this is priceless. She will now have to live with this scourge for the remainder of her life.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Sam N. Ghoumbrial, M.D.
SNG/rtd